

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ORANGE ELECTRONIC CO. LTD.,

Plaintiff,

v.

**AUTEL INTELLIGENT TECHNOLOGY
CORP., LTD.,**

Defendant.

Case No. 2:21-cv-00240-JRG

JURY TRIAL DEMANDED

**DECLARATION OF JAMES A. FUSSELL IN SUPPORT OF DEFENDANT’S
REPLY IN SUPPORT OF MOTION TO DISMISS**

I, James A. Fusell, make the following declaration in support of Defendant Autel Intelligent Technology Corp., Ltd.’s Motion to Dismiss for Lack of Personal Jurisdiction, Insufficient Service of Process, and Failure to State a Claim.

1. I am attorney of record for Defendant Autel Intelligent Technology Corp., Ltd (“Autel ITC”) in the above captioned case.

2. I am over eighteen years of age. I have personal knowledge of the matters set forth below. If called as a witness, I could and would competently testify as to the truth of the matters set forth herein.

3. Exhibit 1 is a true and correct copy of Autel US Inc.’s declaratory judgment complaint brought against Orange Electric Co., Ltd. in the Eastern District of Virginia, styled *Autel US Inc. v. Orange Elec. Co., Ltd.*, No. 1:21-cv-1321 (E.D. Va. Nov. 29, 2021).

I hereby affirm under penalty of perjury that the foregoing is true and correct.

Executed on this 18 day of January 2022.

/s/ James A. Fussell

James A. Fussell